

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

TIMOTHY BARTON, et al.

Defendants.

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C.A. No. 3:22-cv-2118-X

**APPENDIX IN SUPPORT OF RECEIVER'S SUPPLEMENTAL BRIEF IN SUPPORT
OF MOTION TO SUPPLEMENT ORDER APPOINTING RECEIVER**

Respectfully submitted,

By: /s/ Charlene C. Koonce

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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(d)(1)(B), as amended, no certificate of service is necessary, because this document is being filed with the Court's electronic-filing system.

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>PAGES</u>
A	Declaration of Cortney C. Thomas	APP000001-0018
A-1	SEC Subpoena	APP000019-0046
A-2	Email dated May 23, 2016 from Tim Barton to Sakya Bedoya making Max Barton owner in TRTX Properties	APP000047-0048
A-3	Excerpts of testimony of Saskya Bedoya, taken March 10, 2022	APP000049-0057
A-4	Bedoya emails regarding transfers	APP000058-0062
A-5	Excerpts of testimony of Tim Barton, taken May 24, 2021	APP000063-0067
A-6	Resolutions of TRTX Properties, LLC dated December 17, 2020	APP000068-0070
A-7	Certificate of Amendment for TRTX Properties, LLC dated July 20, 2020	APP000071-0074
A-8	Statement of Change of Registered Office/Agent dated May 2, 2022	APP000075-0077
A-9	Warranty Deed with Vendor's Lien of TRTX Properties, LLC dated May 29, 2020	APP000078-0082
A-10	<u>GILLESPIE VILLAS</u> Amended and Restated Company Agreement of Gillespie Villas LLC dated April 28, 2022 <ul style="list-style-type: none"> • Certificate of Formation Limited Liability Company for Gillespie Villas, LLC, filed on April 18, 2022 • Deed of Trust and Security Agreement dated May 11, 2022, between Broadview Holdings and Gillespie Villas, LLC • Broadview Holdings checks referencing "Gillespie" • Guaranty dated August 23, 2022 between Gillespie Villas, LLC ("Borrower"), Xiao-En Fang ("Lender") and Enoch Investments, LLC ("Guarantor") signed by Maximilien Barton as President • Subordination Agreement dated August 23, 2022, between Broadview Holdings, LLC and Gillespie Villas, LLC 	APP000083-0117 APP000118-0120 APP000121-0140 APP000141-0146 APP000147-0151 APP000152-0156
A-11	<u>ONE SF RESIDENTIAL</u> <ul style="list-style-type: none"> • Corporate Entity Name List • Certificate of Formation – ONE SF Residential 	APP000157-0159 APP000161-0162

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>PAGES</u>
	<ul style="list-style-type: none"> Texas Franchise Tax PIR – ONE SF Residential 	APP000163
A-12	<u>VENUS59 LLC</u> <ul style="list-style-type: none"> VENUS59 EIN Certificate of Formation – VENUS59, LLC Company Agreement – Venus59, LLC Texas Franchise Tax PIR – VENUS59, LLC Broadview Holdings check to VENUS59, LLC Funding Agreement – Venus59, One SF Residential 	APP000164-0171 APP000171A-B APP000172-0204 APP000205-0207 APP000208 APP000209-0261
A-13	<u>TRTX PROPERTIES, LLC</u> <ul style="list-style-type: none"> Texas SOS – TRTX Properties, LLC Certificate of Formation – TRTX Properties, LLC Reinstated Regulations of TRTX Properties Barton email to Bedoya Notice of Appeal; <i>In re: FM 544 Park Vista, Ltd, et al.</i> Texas Franchise Tax PIR – TRTX Properties Statement of Change of Registered Agent – TRTX Properties Broadview Holdings check re TRTX Properties 	APP000262-0265 APP000266-0267 APP000268-0303 APP000304 APP000305-0308 APP000309 APP000310-311 APP000312
A-14	<u>MXBA LLC</u> <ul style="list-style-type: none"> EIN – MXBA – Maximilien Barton sole member Broadview Holdings checks to MXBA LLC 	APP000313 APP000316
A-15	<u>TITAN INVESTMENTS</u> <ul style="list-style-type: none"> Statement of Organizer – Titan Investments State of Delaware Certificate of Formation – Titan Investments, LLC Limited Liability Company Agreement – Titan Investments Application for Registration of Foreign LLC – Titan Investments Contract of Sale between First Development Co. of Ohio and Titan Investments, LLC Letter of Intent – Titan Investments and Datavault Joint Venture Letter of Intent – Titan Investments and First Development Co. of Ohio Resignation of Tim Barton from Titan Investments Contract of Sale between Kingdom Road Equities and Titan Investments 	APP000317-0318 APP000319 APP000320-0323 APP000324-0325 APP000326-0347 APP000348-0351 APP000352-0356 APP000357 APP000358-0373 APP000374-0376

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>PAGES</u>
	<ul style="list-style-type: none"> Receipts and Disbursements Ledger – Titan Investments Broadview Holdings checks – Titan Investments 	APP000377-0383
A-16	Participation Agreement – Marine Creek	APP000384-0413
A-17	<u>TC HALL, LLC</u> <ul style="list-style-type: none"> Limited Liability Company of TC Hall, LLC Texas Secretary of State – TC Hall, LLC 07.19.22 Email from Tim Barton to Area Pamenari 06.30.22 Letter from Louisiana National Bank to Enoch Investments Broadview Holdings checks re: Hall Street Prosperity Bank – Receipts and Disbursements Ledger Commonwealth Title – Single Ledger Balance Vista Bank statements Commonwealth Title of Dallas Substitution Form 1099-S 08.24.22 Email from Barton regarding wiring instructions Broadview Holdings checks referencing TC Hall 	APP000414 APP000420 APP000421 APP000422-0423 APP000424-0426 APP000427-0428 APP000429-0432 APP000433-0442 APP000443 APP000444 APP000444A-B
A-18	Texas Secretary of State Certificate of Filing of Titan Investments, LLC	APP000445-0448
A-19	<u>LC ALEDO TX, LLC</u> <ul style="list-style-type: none"> Statement of Change of Registered Agent – LC Aledo TX, LLC Texas Secretary of State Registered Agent – LC Aledo TX, LLC Excerpts from Supplement to Amended Motion to Compel, <i>Somerset-Lost Creek Golf, Ltd. v. LC Aledo TX, LLC</i>, Cause No. 096-319595-20 Affidavit of Timothy Barton - <i>Somerset-Lost Creek Golf, Ltd. v. LC Aledo TX, LLC</i>, Cause No. 096-319595-20 	APP000449-0451 APP000452-0454 APP000455-0458 APP000459-466
A-20	Wire Transfers	APP000467-0472
A-21	Broadview Holdings check to Holland & Knight	APP000473-0474
A-22	Spreadsheet – TC Hall	APP000475-0480

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>PAGES</u>
A-23	Communications between Receiver counsel and Barton counsel	APP000481-487